1. I am a partner of Chaffin Luhana LLP, an attorney licensed in the state of New York, and duly admitted to practice before this Court, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

17

18

19

20

21

22

23

24

25

26

27

28

2. Because the materials at issue were designated confidential by Uber, Plaintiffs filed the following under seal:

Document	Description	Designating Party
UBER_JCCP_MDL_000032097	Document designated confidential	Uber
UBER_JCCP_MDL_000192322	Document designated confidential	Uber
UBER_JCCP_MDL_000040852	Document designated confidential	Uber
UBER-MDL3084-000099693	Document designated confidential	Uber

	Case 3:23-md-03084-CRB Document 2199-1 Filed 02/03/25 Page 2 of 2
1	
2	
3	I declare under penalty of perjury under the laws of the United States of America that the
4	foregoing is true and correct. Executed this 3 rd Day of February, 2025 in New York, New York.
5	Executed this 3 Day of February, 2023 in New Fork, New Fork.
6 7	/s/ Roopal P. Luhana Roopal P. Luhana
8	Koopai P. Lunana
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
2324	
24 25	
26	
27	
28	